

EXHIBIT 11

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:19-cv-00477-CCE-LPA

THE ESTATE OF NAJEE ALI)
BAKER, by and through his)
Ancillary Administrator,)
Jemel Ali Dixon,)
)
 Plaintiff,)
)
 V.)
)
WAKE FOREST UNIVERSITY, et)
al.,)
)
 Defendants.)
-----)

VIDEOTAPE VIDEOCONFERENCE DEPOSITION
OF
JEMEL ALI DIXON

MARCH 26, 2021
10:05 A.M. - 2:45 P.M.

Reported by: Michelle Maar, RDR, RMR, FCRR

1 MR. KING: The exit video, Katie.

2 This will be Defendant's Trial Exhibit 4.

3 (Exhibit 4, previously marked, is introduced.)

4 BY MR. KING:

5 Q. When we get to your son on the video, I want you
6 to say something so that we can stop. Okay?

7 A. Okay.

8 (Video is played on the shared screen.)

9 THE WITNESS: There you go. That's, that's him.

10 BY MR. KING:

11 Q. Okay. So that -- your son is the person dressed
12 in all black, with the long-sleeved, black T-shirt, that we
13 just saw leaving, with 2.22, I'm sorry, 2 minutes and 22
14 seconds into the video?

15 Mr. King: Is that right, Katie?

16 BY MR. KING:

17 Q. Is that correct, ma'am?

18 A. Yes, sir. That's my son.

19 Q. Okay. I want to continue to play this video.

20 If you see anybody else that is an
21 African-American male wearing either a long-sleeved, black
22 T-shirt or dressed in black with a shirt tied around his
23 waist, will you say that please?

24 A. You said tied, what did he have on, a shirt tied
25 around his waist?

1 CERTIFICATE OF REPORTER

2 STATE OF NORTH CAROLINA AT LARGE, to wit:

3 I, Michelle Maar, RDR, RMR, FCRR, the officer before
4 whom the foregoing videoconference deposition was taken, do
5 hereby certify that the witness whose testimony appears in
6 the foregoing deposition declared her testimony would be
7 given under penalty of perjury, per stipulation, that the
8 testimony of said witness was reported by me through
9 videoconference technology to the best of my ability, and
10 thereafter reduced to writing;

11 That I am neither counsel for, related to, nor
12 employed by any of the parties to the action in which this
13 deposition was taken, and further that I am not a relative
14 or employee of any attorney or counsel employed by the
15 parties thereto, nor financially or otherwise interested in
16 the outcome of the action.

17 That I am located in Wake County, North Carolina.

18 That the deponent declared by stipulation indicated
19 she was located in New York City, NY.

20 Michelle Maar21
22 Michelle Maar, Court Reporter23
24 Notary Public #201628400102

25 My Commission expires October 4, 2021